Exhibit of William R. Easton
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Depreciation Lives for Telecommunications Equipment:

Review & Update

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Printed in the United States of America.

Published by Technology Futures, Inc.
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Acknowledgments

This report documents a study by Technology Futures, Inc. (TFI) on behalf of the Telecommunications Technology Forecasting Group (TTFG). Although TFI gratefully recognizes the assistance and support of many individuals and organizations, the views contained herein are those of TFI, are based on TFI's independent analysis, and do not necessarily represent the views of the sponsoring organizations.

We would like to thank the TTFG. The TTFG member companies supporting this study and their representatives on the TTFG Advisory Board are as follows:

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In addition to the contributions already cited, TFI would also like to thank Debra R. Robison and Helen Mary V. Marek who were responsible for the production and design of this report.

Depreciation Lives for Telecommunications Equipment:

Review & Update

Local exchange carriers (LECs) have over $250 billion invested in their networks. Over 80% of this investment falls into three categories—outside plant, circuit, and switching. In each category, tremendous changes are underway which are obsoleting the bulk of existing investment and making necessary large amounts of new investment. Since telephone equipment has traditionally been assigned long depreciation lives, these changes mean that existing equipment will be obsolete, and likely out of service, well before existing investment has been recovered under current regulatory depreciation schedules. This report reviews our assessment of the situation and our recommendations for LEC depreciation lives.

Drivers for Change

There are three highly-interrelated drivers that are driving change in telecommunications: technology, competition, and new services. None of these are fully accounted for in the traditional approach to regulatory depreciation. This section briefly reviews these drivers and how they reinforce each other.

Technology Advance

Advances in technology are providing more efficient and functional ways of offering traditional telephone services, as well as wireless services, video services, and new digital communications. Four of the key technologies are:

- Fiber in the loop (FITL), including any architecture that extends fiber into the distribution portion of the local loop. The last link to the customer may be on fiber, copper pairs, coaxial cable, or wireless.

There are a number of architectures that are under consideration or are being planned. A true consensus has yet to emerge on a single FITL architecture. Continuing changes in technology costs, regulation, business relationships, market forecasts, and market share assumptions probably mean that consensus will be arrived at only gradually. Whatever architecture is chosen, it will displace the vast majority of copper investment.

- Advanced digital switching, especially Asynchronous Transfer Mode (ATM) switching.

The next major switching generation, ATM switching, is optimized to handle all types of traffic on the network efficiently and quickly. Today's digital switches use time division multiplexing to connect continuous streams of digitized voice or data at 64 Kb/s for the duration of a call. This is efficient for low-speed, circuit-switched applications such as voice, but it is unusable or inefficient for high-speed digital applications, especially those with bursty (non-continuous) traffic characteristics. ATM switches, on the other hand, use small fixed-length packets called cells. Unlike conventional packet switches, ATM switches do not introduce significant signal delay (because of the simple cell structure) which means they can be used for continuous, real-time applications such as voice and videoconferencing. However, since ATM uses packet switching, it is also good for bursty data traffic. The ability to handle all types of traffic, at all variable data rates, not only makes ATM an efficient switch, but it is also ideal for networked multimedia applications that use all types of communications

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- Synchronous Optical Network (SONET) transmission on fiber optic systems, including Next Generation Digital Loop Carrier (NGDLC) systems incorporating SONET.

SONET is a new format for organizing information on a fiber optics channel that recognizes the need for integrating different types of traffic on the same pair of fibers. Among its many advantages are standardized optical and electrical interfaces to which all suppliers must adhere. Another is that an individual information stream on a fiber channel can be efficiently separated from the rest of the information on the channel. With a SONET add-drop multiplexer any signal can be extracted with a single piece of equipment without breaking down the whole signal. SONET add-drop multiplexers are already cost-competitive with asynchronous equipment and soon will be commodity items that are integrated into almost every piece of circuit (and switching) equipment. This will render redundant much existing circuit equipment, including digital crossconnects and multiplexers.

Further, with SONET, carriers can mix-and-match circuit equipment so that they can use different manufacturers' equipment. This, of course, provides operational and equipment savings, as well as more competition between manufacturers. Later on, SONET interfaces will be built directly into switches, leading to even more equipment savings. NGDLC systems will directly link to switches through SONET interfaces. From the same unit, some channels may be connected to other switches or facilities using a built-in SONET add-drop multiplexer. Circuits could be transferred from one switch to another instantaneously. This will give carriers much more flexibility when it comes to dealing with switch manufacturers. SONET will benefit customers as well as carriers. In addition to the inherent economic benefits of a more efficient network, SONET will provide greater reliability through its support of fiber ring architectures and enhanced response time and flexibility in provisioning new channels.

- High-capacity digital wireless technologies such as Time Division Multiple Access (TDMA) and Code Division Multiple Access (CDMA).

These digital wireless technologies can multiply the capacity of existing cellular systems by a factor of from three to 10 and will also be utilized with the new personal communications systems. One implication of the increased capacity is the ability to compete more directly with wireline service.

In a nutshell, the benefits of these technologies are reduced operating costs, reduced capital costs, better service, or, in some cases, new services. The technologies are all well-understood and do not require scientific, engineering, or economic breakthroughs to be deployed. There is widespread agreement about their benefits and cost targets. While there is some controversy about the details and timing, there is consensus that the future of telecommunications is built around these technologies.

Competition

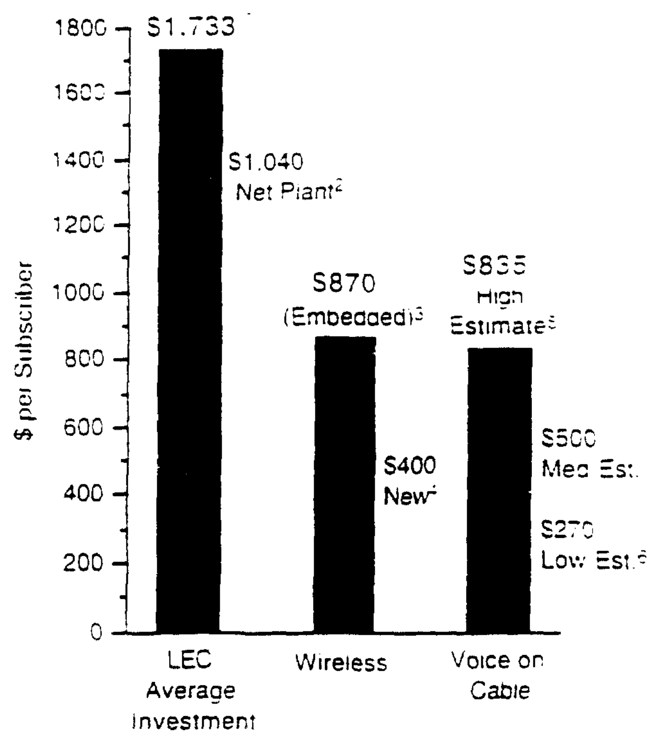
Competition has entered the local exchange business, and it will increase dramatically over the next few years. So far, most local exchange competition has centered on the large business customer. Competitive access providers (CAPs) are already serving large businesses in concentrated areas, and cable television companies are providing alternative access for high-bandwidth services. CAPs are installing the latest, most efficient technology—fiber optics, SONET, and, in cities/locations where they provide switched services, modern digital switching.

The next competitive arena will be the mass market for voice services. Such competition has already begun in public phones and, in some states, in intra-LATA long distance. Two additional, more pervasive sources of competition are cable television networks and wireless networks, specifically cellular and personal communications services (PCS). Technologies are emerging that will allow voice to be added to state-of-the-art cable systems at a cost that is less than on copper pairs. On a per-subscriber basis, cellular technologies are already less costly than wireline. With the new high-capacity digital wireless technologies, such as TDMA and especially CDMA, wireless technologies will also be less costly on a per-minute of use basis. Exhibit 1 illustrates some of these cost comparisons.

Because they are more efficient, the new technologies offer very substantial cost advantages to new entrants in local telecommunications. These new entrants can invest in the most efficient modern equipment without regard to an embedded infrastructure such as the LECs have. This, in turn, will pressure LECs to adopt new technology quickly in order to stay competitive. Thus, competition reinforces the technology drivers and magnifies the obsolescence of the old technology.

Exhibit 1

Investment Per Subscriber



Source: USTA Engineering Subcommittee on Depreciation

[1] Industry investment of $260 billion and 150 million access lines at year-end 1993.

[2] Net plant assumes 40% depreciation reserve (industry average at year-end 1993).

[3] Total wireless industry investment divided by number of customers (source: CTIA, year-end 1993).

[4] Annual wireless industry investment increase divided by customers gained (source: CTIA, year-end 1993).

[5] Estimate by Hatfield Associates, Inc. in a 1994 study for MCI, Alternative Distribution and Access Technologies. Includes land and buildings, switch, network interface unit, backhaul, and customer connection (similar to fee paid by cellular to sales agent, $320).

[6] Estimate by David P. Reed in "The Prospects for Competition in the Subscriber Loop: The Fiber-to-the-Neighborhood Approach," presented at the 21st Annual Telecommunications Research Policy Conference (September 1993). It represents costs allocated to telephony for upgrading a cable system for interactive TV and telephony.

New Services

The third driver is the impending emergence of digital communications services for the mass market. These services will support both television and computer-based applications requiring digitized transmission of text, audio, and still and moving images. The applications for these services include advanced fax, computer-based imaging, LAN interconnection, videoconferencing, interactive multimedia, video on demand, and interactive television. Today, the market for digital communications services for these applications is relatively small; however, the potential for growth is tremendous, especially when these services are extended beyond large business customers.

Ultimately, the telephone network will provide full broadband, multimedia communications services based on three of the technologies we have mentioned: fiber optics, SONET transmission, and ATM switching. Along the way, intermediate steps will include narrowband Integrated Services Digital Network (ISDN) and video on demand services. Since some of the new services blur the traditional distinctions between telephony, television, publishing, information systems, and computing, they foster a new type of competition focused on the convergence of these industries. In this environment, competitive advantages belong to those companies that can deliver a package of diverse services for the least cost. As it happens, the new technologies allow delivery of multiple services at overall costs that are comparable or less than the traditional delivery mechanisms for the individual services.

Impacts on Depreciation Lives

Alone, any one of these drivers would cause significant change in the deployment of technology. Together, they are forcing unprecedented change that is rendering most of today's telephone network obsolete. Although satisfactory for voice services, today's network is expensive to operate and offers limited functionality in terms of mobility and digital services. It was optimized and constructed for the age of electromechanical and analog switching and copper cable, an age which for a decade has been giving way to digital switching and fiber optics. Much of the equipment placed in the last decade is becoming obsolete in the face of new technologies such as SONET and ATM. Thus, if LECs are to remain viable, they must rebuild their networks—sooner rather than later. This necessitates continued.

massive investment in new technology that requires much shorter lives for existing investment than are currently prescribed by regulators.

Weaknesses in Regulatory Depreciation Methods

The traditional method for estimating depreciation lives is to examine mortality data for older vintages and assume that all vintages will experience the same age-dependent characteristics. For example, if 60% of the units of a particular technology installed in 1983 were still in service in 1989 (six years later), we would assume that 60% of the units installed in 1990 would still be in service in 1996 (again, six years later). (This greatly over-simplifies, but captures the basic idea.) The assumption of age-dependent retirements reflects a situation where wear-out or breakdown drives the replacement process. Under this model, new technology (or perhaps a new unit of old technology) replaces old technology only when the old technology wears out or breaks. This is an accurate model for some situations: for example, it reflects the way most companies replace motor vehicles.

Today, however, technological obsolescence is a major cause of retirements in telecommunications for switching and circuit equipment, and is also expected to be for outside plant in the near future. (Other drivers—competition and new services—are largely reflected in this driver.) Mortality analysis alone is not appropriate in such a situation. This is made clear in Exhibit 2, which plots the vintage survivor curves for crossbar switching. These are similar to normal survivor curves except that a separate investment life cycle is shown for each vintage of equipment. Note the "avalanche effect" between 1975 and 1980. During this period, all vintages experienced sudden and simultaneous retirements, as electronic switching was rapidly adopted.

One can also see from the avalanche curves that, when technological obsolescence is the major driver for retirements, there is no such thing as a constant service life. Equipment purchased late in a technology generation will have a much shorter life than a piece of equipment purchased earlier. Further, the expected service life of equipment purchased late in the cycle is roughly the same as the average remaining life of existing equipment. These observations are contrary to mortality-based depreciation, but they reflect reality.

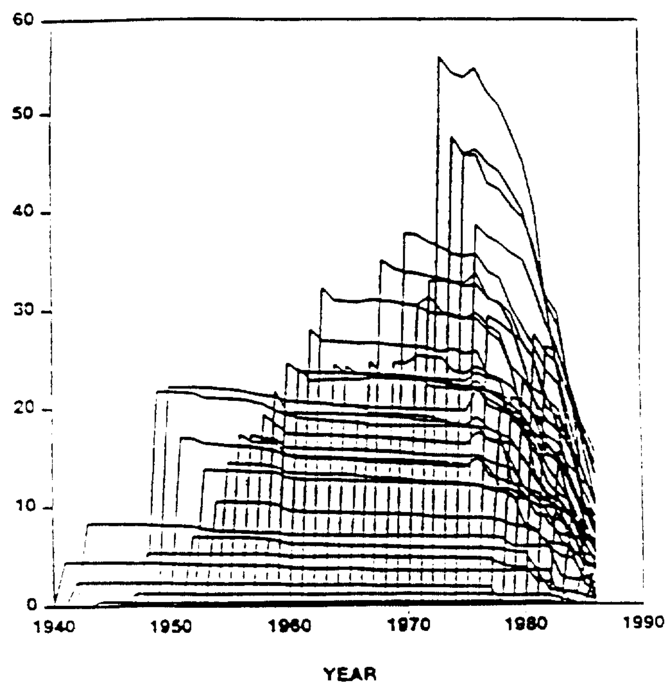
Most important, until the avalanche begins, life estimates for the old technology using mortality-based analysis will be based on an extension of the pre-avalanche trend and, thus, will be way too long. Not only will the life estimates be wrong, but they will be wrong right up to the moment the avalanche begins. To use a different metaphor, this is like paddling a rowboat without ever looking forward. You are over the falls before you know anything is wrong!

Exhibit 2
Avalanche Curves

Vintage Survivor Curves

1940-65 Crossbar Vintages

Plant In Service (Million Dollars)



Source: Bellcore

The original replacement technology for crossbar switching was analog stored program control (ASPC) switching, first introduced in the mid-to-late 1960s. Note that the avalanche of crossbar retirements begins in about 1975, more than five years after the introduction of the new technology.

Also note that very large amounts of investment were made in the old technology very late in its life cycle, even after the new technology was available. Although this behavior may seem odd, it is typical of many technologies and can often be perfectly rational. (For example, millions of 486 personal computers have been sold since the introduction of the replacement technology, the Pentium.) It can result from several factors:

(1) The need to maintain existing equipment and service levels.

(2) Restrictions on the availability of the new technology.

(3) High relative costs for the new technology early in its life cycle.

(4) An inherent bias toward the existing technology.

However, we must keep in mind that the last purchases of old technology will have especially short lives.

An important implication of this phenomenon is that recent investment patterns in the old technology tell us little about the likely adoption of new technology, even in the near future. Purchase volumes of the new technology may be smaller than those of the old technology almost to the time the avalanche begins.

Using Technology Forecasting to Estimate Depreciation Lives

Fortunately, there are reliable methods that allow us to forecast future technology changes and, thus, depreciation lives. Developed and tested over many years in telecommunications and other industries, these methods have proven to be very reliable for forecasting. Their basis lies in an understanding of the process of technology change and the use of available data to produce quantitative forecasts.

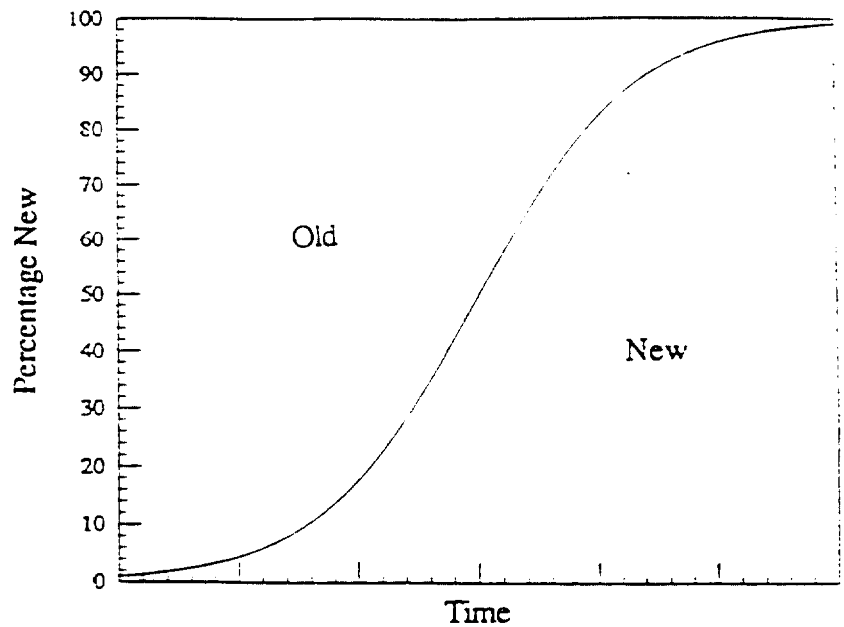
One technology forecasting method, substitution analysis, has been proven effective in projecting the adoption of new technologies and the obsolescence of old technologies. Substitution refers to the displacement of an established technology by a newer technology when the new technology provides substantially improved capabilities, performance, or economies. With substitution, technological superiority of the new technology—not wear-out—is the driver for replacement.

With substitution analysis, we examine patterns of technology substitution. The pattern is remarkably consistent from one substitution to another, and is characterized by an S-shaped curve when the market share of the new technology is plotted over time. Exhibit 3 shows the S-shaped curve for the Fisher-Pry model. Of the several substitution models available, in general, we have found the Fisher-Pry model—and its extensions, notably, multiple substitution models based on the same principles—to be the most useful for forecasting. The adoption of a new technology starts slowly because, when it is first introduced, a new technology is usually expensive, unfamiliar, and imperfect. The old technology, on the other hand, has economies of scale and is well-known and mature. As the new technology improves, it finds more and more applications, it achieves economies of scale and other economic efficiencies, and it becomes generally recognized as superior. The old technology, because of its inherent limitations and falling market share, cannot keep up. The result is a period of rapid adoption of the new technology, beginning at the 10% to 20% penetration level. This corresponds with a period of rapid abandonment of the old technology, i.e., the avalanche. Toward the end of the substitution, adoption of the new technology slows down again as the last strongholds of the old technology are penetrated.

Since the pattern of how a new technology replaces an old one is consistent, we can apply the pattern to a technology substitution in progress, or one just beginning, to forecast the remainder of the substitution and estimate the end date for the old technology. We can apply substitution analysis even in cases where the substitution has yet to begin by using appropriate analogies, precursor trends, or evaluation of the driving forces. More information on the Fisher-Pry model and its application is provided in Attachment 1.

Exhibit 3

The Fisher-Pry Model



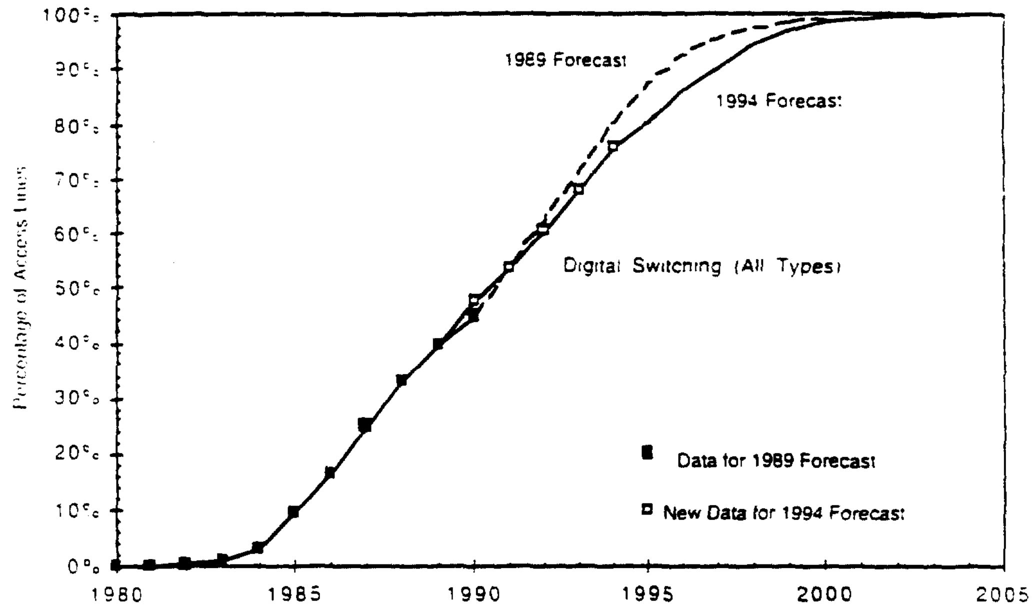
Source: Technology Futures, Inc.

Experience with the Fisher-Pry Model

Although no forecasting method is perfect, our experience with the model has been excellent. Occasionally, we compare prior forecasts with subsequent data and new forecasts. These comparisons demonstrate the accuracy of the model within reasonable tolerances.

An example is a forecast that Technology Futures, Inc. (TFI) prepared in 1989 for the substitution of digital switching for analog switching by major LECs. Exhibit 4 shows the 1989 forecast, and the solid markers show the data available for the forecast. The actual data for subsequent years, shown by the hollow markers, traces the 1989 forecast within about 10%, and almost exactly matches the projected end date. Our earlier forecasts, dating back to the mid-1980s, were less perfect regarding the year-by-year pattern, but accurately forecast the end-date for analog switching to be between 1997 and 2001. This was at a time when many experts thought there would be no retirements at all of analog ESS switches before 2000!

Exhibit 4
Comparison to 1989 Digital Switching Forecast



Source: Technology Futures, Inc.

Comparison of Mortality Analysis and Substitution Analysis

Substitution analysis provides better indicators of lives than mortality-based methods because substitution analysis recognizes that technological obsolescence is the major driver for retirements. As previously noted, analysis of recent retirement and investment data could not have predicted the rapid retirements of electromechanical switches between 1975 and 1980 (the avalanche shown in Exhibit 2). Using historical data, a substitution analysis performed as early as 1970 would have predicted the avalanche. This is because substitution analysis recognizes the early adoptions of the new technology, in this case analog SPC switches, years before significant quantities of the old technology are retired—and even when large investments in the old technology are still being placed. The early adoptions, corresponding to the first, relatively flat part of the S-shaped substitution curve, are often for growth applications that do not cause significant retirements.

However, they are a *precursor* for later replacement programs that do result in retirements. This is one reason why substitution analysis can predict the edge of the waterfall. The steep part of the S-shaped curve, where new technology is placed very rapidly, corresponds to the avalanche of retirements.

The example shown in Exhibit 4 again illustrates the power of technology forecasting. Substitution analyses done in the mid-to-late 1980s predicted the avalanche that is burying the analog ESS accounts of the major LECs today.

Another important point is that substitution analysis measures technology in terms of physical units in use. For example, we forecast access lines in service or equivalent circuits in service. Beside measuring in physical units rather than dollars, substitution analysis reflects whether a unit of investment is useful as opposed to whether it is retired. On fundamental principles, usefulness is the better depreciation measure because it reflects the productive value of an asset. Also, because of the potential lag between the end of an asset's useful life and its retirement, retirements are typically a late indicator of major changes in an account. Following the avalanche curves, obsolescence-based retirements show up only after the story is almost over. Measuring units in use, on the other hand, provides a leading indicator.

Why Using Technology Forecasting for Life Estimation Is So Important Now

Throughout the history of telephony, technology advance has caused the replacement of old technology, as evidenced by previous avalanche curves and S-shaped substitution curves. However, there are several things that make things different now. First, we are in a period where rapid advances in microelectronics and fiber optics technology are reshaping telecommunications economics at an unprecedented pace. Second, these changes are impacting all parts of the network simultaneously, leading rapidly to a broadband network architecture that is fundamentally different than today's. Third, there are two other drivers, competition and new services, that reinforce the already strong technology driver. The result will be simultaneous avalanche curves occurring in all major investment categories during the late 1990s and early 2000s.

Historically, avalanche curves have been recognized by the regulatory depreciation process after the fact since traditional depreciation analysis provides no way to predict them. Since avalanches usually reflect retirements that occur before the end of the equipment's prescribed depreciation life, they create depreciation reserve deficiencies. In the past, these reserve deficiencies have been recovered by amortizations over future years. This approach worked satisfactorily in the days when avalanches were the exception rather than the rule, and when the monopoly structure of the industry allowed reserve deficiencies to be recovered from future ratepayers. However, in the new environment, this approach is less likely to work. Capital must be recovered while the investment is still useful—before it is retired. The competitive environment will not allow LECs to recover investment in both old and new technologies simultaneously. This means that lives must be accurately estimated as early as possible—before the avalanche begins, and even before explicit replacement programs are in place. This is why using technology forecasting to predict depreciation lives is so important.

TFI Telecommunications Technology Forecasting Studies

Technology Futures has been applying technology forecasting to the telecommunications industry since 1984. Much of our telecommunications work has been supported by the Telecommunications Technology Forecasting Group (TTFG), an industry association of major LECs in the United States and Canada which was formed in 1985. The mission of the TTFG is to promote the understanding and use of technology forecasting techniques, economic evaluators, and engineering models to predict and support the continued evolution of the telecommunications network. Under TTFG sponsorship, TFI has produced numerous major studies on telecommunications technology adoption in a span of 10 years, long enough to establish a track record. The list is shown in Attachment 2.

The TFI studies fall into three general categories. First is a series of industry studies on the adoption of new technology in the telephone network. We started doing these studies in 1985 and have issued updates over the years. The most recent report, *Transforming the Local Exchange Network: Analyses and Forecasts of Technology Change*, was issued in 1994 and covers switching equipment, outside plant, and circuit equipment. These studies provide quantitative forecasts of the adoption of new technology—and the replacement of old technology—in future years.

Second is a set of seven studies completed between 1991 and 1993 on the need for and adoption of new digital telecommunications services. In these studies, we assessed the drivers and benefits, as well as the constraints, of new services to provide applications such as advanced fax, electronic imaging, interactive multimedia, local area network interconnection, videoconferencing, and interactive television. We concluded that there is a potential mass market for these applications, and that the widespread availability of digital services is required to serve them. We then developed quantitative forecasts of demand over time for digital services at various data rates. The results of the studies were summarized in our 1993 report *New Telecommunications Services and the Public Telephone Network*.

Third are several studies on the effect of competition on the existing investment in the local exchange network. These studies quantify the revenue losses in voice services that are likely due to competitors using technologies that make obsolescent today's copper network. The most recent is our 1995 report, *Wireless and Cable Voice Services: Forecasts and Competitive Impacts*.

A unifying conclusion from these studies is that regulatory depreciation lives are much too long, especially given the climate of rapid change we are entering.

Life Estimates for Telecom Equipment

The remainder of this report reviews the TFI industry forecasts for the major categories of LEC network equipment: outside plant, circuit, and switching. Since the same basic drivers are present across the nation (technology advance, competition, and the need for new services), the industry perspective is generally applicable to individual companies. The forecasts are detailed in *Transforming the Local Exchange Network*. The estimated average remaining lives (ARLs) reported herein have been updated to January 1, 1995 from the January 1, 1994 values that were reported in the referenced document. Tabular data for the forecasts are provided in Attachment 3.

Metallic Cable

The outside plant is traditionally split into underground, buried, and aerial accounts. From the viewpoint of cable placement and wear-out, this is a logical categorization; but when technological obsolescence is the driver for change, the categorization is less useful. In applying technology forecasting, we have, instead, distinguished between interoffice, feeder, and distribution plant, which are spread among the three traditional accounts.[1] We chose this approach because technology is being adopted differently and at different times in the interoffice, feeder, and distribution parts of the exchange network.[2] Also, some of the driving forces of change are different.

Outside Plant—Interoffice Cable

At year-end 1993, the interoffice plant was 96% digital and 74% fiber, as measured by circuits in use.[3,4] Thus, there is relatively little metallic investment still being used in the interoffice environment. Almost all new investment is fiber and the metallic carrier share has declined steadily. Exhibit 5 shows the technology shares over time. Our forecasts indicate that, for the industry, the interoffice network will be almost 100% fiber by 2000.

Our forecast for the adoption of fiber, and the displacement of non-fiber facilities, is based on a multiple substitution analysis of historical data through year-end 1993 and planning data through year-end 1995.[5] For interoffice copper, the analysis indicates an ARL of 2.9 years as of 1/1/95.[6]

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[1] *Interoffice* facilities connect telephone company central offices (where the switches are located) with each other. *Feeder* facilities are cables that extend from a central office toward the neighborhoods and business areas served by the central office. A typical feeder cable usually serves a large number of customers. The *distribution* network extends from the termination of the feeder facilities to residences and businesses.

[2] For example, most interoffice facilities today are fiber optic systems, while most feeder facilities are provided on copper cables. However, the use of fiber optics in the feeder network is growing rapidly. In the distribution network, copper cable is by far the most common technology, although fiber optic systems are beginning to be adopted.

[3] To be more precise, our units are "equivalent voice-frequency circuits in use," although we usually just refer to them as "circuits." For example, a voice frequency copper circuit on two or four wires counts as one circuit. Each voice frequency equivalent circuit in use on a carrier system is counted as one circuit. Both switched and dedicated circuits are included. For data services, each 64 Kb/s is considered to be equivalent to one circuit. Thus, a leased DS1 line (1.544 Mb/s) is counted as 24 circuits.

[4] *Source:* Year-end 1993 ARMIS data reported to the FCC.

[5] The historical data for 1980-1989 is from TFI files, the historical data for 1990-1993 is from ARMIS reports filed with the FCC, and the planning data for 1994-1995 is the weighted average from the seven LECs (representing over 90 million working access lines in 1993) that provided us planning data. (We used the planning data in our forecast because we have generally found that the first several years of planning data is reliable and improves mid- to long-range forecasts.)

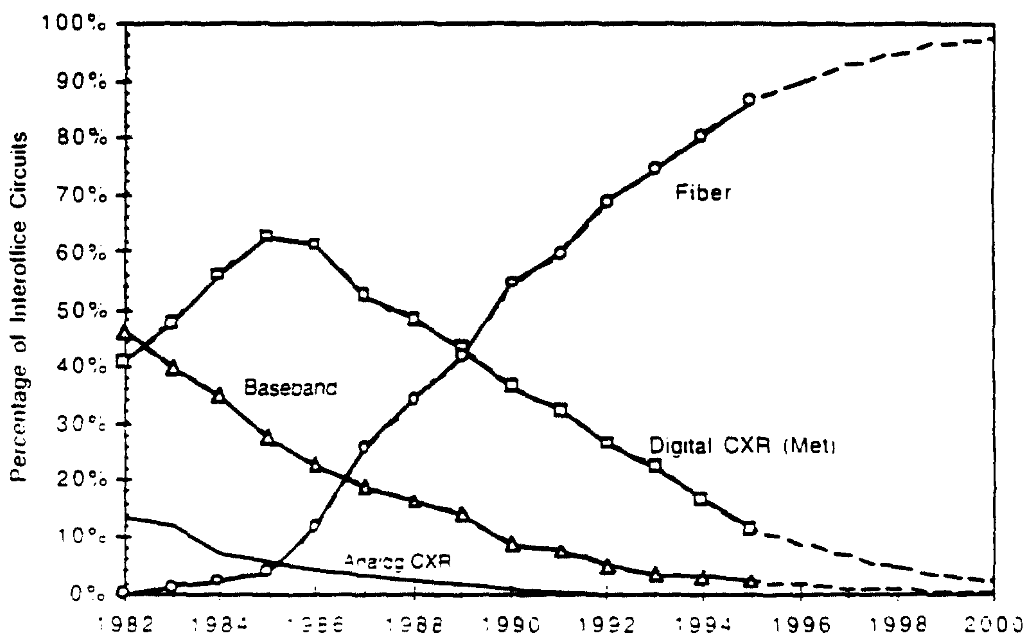
[6] See Table 3.1 in Attachment 3 for ARL computations.

Outside Plant—Feeder Cable

In the feeder plant. Digital Loop Carrier (DLC) systems have been reducing the need for copper pairs for many years. Both metallic-based and fiber-based DLC systems have been adopted. although fiber DLC systems are beginning to dominate in the industry. The replacement of both voice frequency copper cable and metallic-based DLC systems by fiber optic systems characterize future technology change in the feeder plant.

Exhibit 5

Interoffice Technology Shares



Source: Technology Futures, Inc.

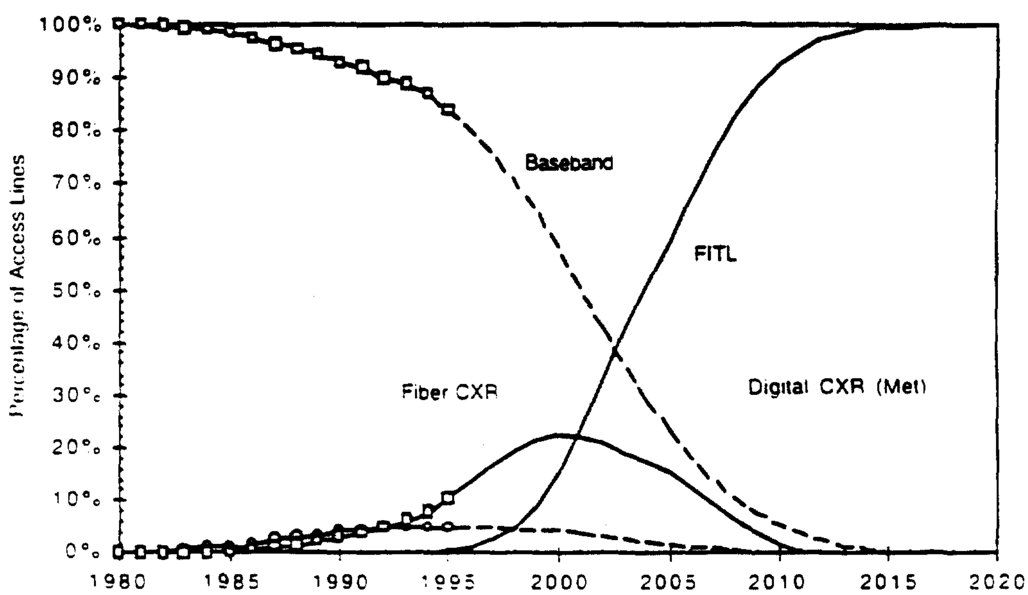
Exhibit 6 shows the percentage of access lines served by each of the major technology types for the industry. The forecast is based on a multiple substitution analysis of historical and planning data, shown by the markers.[7] Between 1995

[7] The historical data for 1980-1989 is from TFI files. the historical data for 1990-1993 is from ARMIS reports filed with the FCC. and the planning data for 1994-1995 is the weighted average from the eight LECs (representing over 100 million working access lines in 1993) that provided us

and 2000. conventional fiber-based DLC will continue to grow. reaching a peak at about 23% of access lines by 2000. This period will also see the rapid growth of fiber in the loop (FITL) systems. which. under the industry middle scenario (discussed in the next section). are forecast to serve 15% of access lines by 2000. After 2000. FITL systems are forecast to rapidly displace all other types of feeder technologies. serving 50% of access lines by 2004. 90% by 2010. and essentially all access lines by 2015. Based on these results. an industry ARL of 7.0 to 7.8 years (as of 1/1/95) is expected for feeder metallic cable. depending on which FITL scenario is chosen.[8]

Exhibit 6

Feeder Technologies—Percentage of Access Lines



Source: Technology Futures. Inc.

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planning data. While DLC will continue to substitute for feeder copper. FITL systems will also impact feeder copper facilities in the same manner it will distribution facilities. With very few exceptions. FITL will require fiber feeder. Thus. we incorporated the FITL adoption into the feeder multiple substitution analysis.

[8] See Table 3.2 in Attachment 3 for ARL computations.

Outside Plant—Distribution Cable

We use the term FITL to refer to any architecture that extends fiber to an area of no more than several hundred customers; the last link to the customer may be on copper pairs, coaxial cable, fiber, or wireless. There are a number of architectures that are under consideration or are being planned. A true consensus has yet to emerge on a single FITL architecture. Continuing changes in technology, costs, regulation, business relationships, market forecasts, and market share assumptions probably mean consensus will be arrived at only gradually. Whatever architecture is chosen, it will displace the vast majority of copper investment.

Our analysis of distribution facilities includes three scenarios for the adoption of FITL. Each of these scenarios is based on composite forecasts of the demand for wideband and broadband digital services. The "early" scenario assumes that fiber is deployed rapidly to meet the emerging demand for new wideband services at 1.5 Mb/s or similar data rates. The "late" scenario assumes that wideband services are deployed on copper pairs using interim copper technologies such as Asymmetrical Digital Subscriber Line (ADSL) and High-speed Digital Subscriber Line (HDSL), and that fiber is not rapidly adopted until the demand for broadband services (45 Mb/s and above) emerges. The "middle" scenario is an average of the two others.

Exhibit 7 shows forecasts for the demand for wideband and broadband services from TFI's recent *New Services Study*.[9] Also shown is the required fiber deployment under the early and late scenarios, respectively. The relationship between deployment (which determines service availability) and demand is derived from a prior TFI analysis of the historical availability and adoption of four TV-based services.[10] Exhibit 8 graphically illustrates the averaging process used to obtain the middle scenario from the other two.

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[9] L. K. Vanston, W. J. Kennedy, and S. El-Badry-Nance, *A Facsimile of the Future: Forecasts of Markets and Technologies* (1991); L. K. Vanston, S. El-Badry-Nance, W. J. Kennedy, and N. E. Lux, *Computer-Based Imaging and Telecommunications: Forecasts of Markets and Technologies* (1992); J. A. Marsh and L. K. Vanston, *Interactive Multimedia and Telecommunications: Forecasts of Markets and Technologies* (1992); B. R. Kravitz and L. K. Vanston, *Local Area Network Interconnection and Telecommunications* (1992); L. K. Vanston, J. A. Marsh, and S. M. Hinton, *Video Communications* (1992); L. K. Vanston, J. A. Marsh, and S. M. Hinton, *Telecommunications for Television/Advanced Television* (1992); and L. K. Vanston, *New Telecommunications Services and the Public Telephone Network* (1993) (Austin, TX: Technology Futures, Inc.).

[10] Vanston, Marsh, and Hinton, *Telecommunications for Television/Advanced Television*, pp. 123-144; and Vanston, *New Telecommunications Services and the Public Telephone Network*, pp. 45-52.